



THE MIRVIS LAW FIRM, P.C.

DEC 03 2019

November 27, 2019

ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: DEC 02 2019

Via ECF

Honorable George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: **United States v. Mishel Levinski**
18 – CR – 509 – 12(GBD)

Honorable Judge Daniels:

On behalf of Mr. Mishel Levinski, I write to respectfully request a modification of Mr. Levinski's bail conditions.

On November 7, 2019, Your Honor modified Mr. Levinski's bond to permit him to travel to two additional ping pong tournaments, one of which takes place in Ontario, Canada from December 4, 2019 through December 8, 2019. As the Court is aware, Mr. Levinski needs his US Passport in order to travel to and from Canada. It is my understanding that Mr. Levinski's Passport is currently in the possession of the FBI. I have requested AUSA Hellman to retrieve the Passport from the FBI agent and to release it to Mr. Levinski. However, AUSA Hellman has advised me that he cannot release the Passport without an explicit Court Order, since it's surrender is a condition of Mr. Levinski's bond.

Wherefore, I respectfully request the Court modify Mr. Levinski's bond to authorize the temporary return of Mr. Levinski's passport for the limited purpose of travel in accordance with the Court's prior permission to visit Canada for the tournament, with return of the passport to pre-trial services and/or the FBI to occur immediately thereafter.

We thank the Court in advance for its attention and consideration of this Application.

Respectfully Submitted,

/s/ Tony Mirvis

By: Tony Mirvis, Esq.



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cc: AUSA Matthew Hellman (Via ECF)
PTSO Jonathan Lettieri (Via ECF)